

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JASON CARRODINE, et al.,

Plaintiffs,

v.

FLATIRON MEDIA LLC, et al.,

Defendant.

Case No. 1:22-cv-09660 (JMF)

**DEFENDANTS UNLIMITED
TRAFFIC LIMITED, SEA RANCH
INTERNATIONAL LIMITED, AND
SEA RANCH INTERNATIONAL PTE.
LTD.’S NOTICE OF MOTION TO
DISMISS PLAINTIFFS’ SECOND
AMENDED COMPLAINT**

**EVIDENTIARY HEARING
REQUESTED**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of the Motion to Dismiss the Second Amended Complaint by Defendant Unlimited Traffic Limited, Defendant Sea Ranch International Limited, and Defendant Sea Ranch International PTE. Ltd. (collectively “the Foreign Defendants”), dated September 13, 2024, and all pleadings, submissions, and proceedings herein, the Foreign Defendants hereby move this Court before the Honorable Jesse M. Furman, United States District Judge, at the United States District Court for the Southern District of New York, located at 40 Foley Square, New York, New York 10007, for the entry of an order dismissing Plaintiffs’ Second Amended Complaint pursuant to Federal Rule of Civil Procedure 12(b)(2). If Plaintiffs contend this Court has personal jurisdiction over any Foreign Defendant, then the Foreign Defendants request an evidentiary hearing to resolve the merits of this motion.

Dated: September 13, 2024
New York, New York

Respectfully submitted,
NEWMAN LLP

/s/ Derek A. Newman _____

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